INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

October 16, 2003

TO: Interested Parties / Applicant

RE: New Horizosn Baing Company / 151-17821-00060

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03

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MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

New Horizons Baking Company
5700 North West Street
Fremont, Indiana 46737

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 151-17821-00060	
Issued by: **Original signed by** Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 16, 2003 Expiration Date: October 16, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary bread baking plant.

Authorized Individual:	Vice President
Source Address:	5700 North West Street, Fremont, Indiana 46737
Mailing Address:	5700 North West Street, Fremont, Indiana 46737
General Source Phone:	(260) 495-7055
SIC Code:	2051
County Location:	Steuben
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) natural gas fired bun oven (identified as Unit A), with a maximum heat input capacity of 4.60 MMBtu per hour and a maximum baking rate of 7,700 pounds of bread per hour, and exhausting at Stack A. This unit was constructed in 1979.

(b) One (1) natural gas fired muffin griddle (identified as Unit B), with a maximum heat input capacity of 2.04 MMBtu per hour and a maximum baking rate of 3,300 pounds of bread per hour, and exhausting at Stack B. This unit was constructed in 1983.

(c) Two (2) flour storage silos (identified as Unit C1 and C2), each with a maximum capacity of 60 tons and a maximum throughput rate of 6.25 tons of flour per hour, equipped with a pneumatic conveyance system, using fabric filters as control. These units were constructed in 1979.

(d) One (1) natural gas fired Hurst boiler (identified as Unit D), with a maximum heat input capacity of 2.60 MMBtu per hour and exhausting at Stack D. This unit was constructed in 1979.

(e) One (1) natural gas fired Kewanee boiler (identified as Unit E), with a maximum heat input capacity of 1.80 MMBtu per hour and exhausting at Stack E. This unit was constructed in 1996.

(f) One (1) 5 KVA emergency generator (identified as Unit G), burning natural gas and exhausting at Stack G. This unit was constructed in 1983.

(g) Six (6) natural gas fired space heaters (identified as F1 through F6), each with a maximum heat input capacity of 0.10 MMBtu per hour. These units were installed in 1979.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) within 90 days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.6 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring

conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(a) One (1) natural gas fired bun oven (identified as Unit A), with a maximum heat input capacity of 4.60 MMBtu per hour and a maximum baking rate of 7,700 pounds of bread per hour, and exhausting at Stack A. This unit was constructed in 1979.

(b) One (1) natural gas fired muffin griddle (identified as Unit B), with a maximum heat input capacity of 2.04 MMBtu per hour and a maximum baking rate of 3,300 pounds of bread per hour, and exhausting at Stack B. This unit was constructed in 1983.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-7]

This source is not subject to the requirements of 326 IAC 2-7 (Part 70 Permit Program) because the potential to emit VOC from the entire source is less than one hundred (100) tons per year. Any change or modification which would increase the potential to emit of VOC equal to or greater than one hundred (100) tons per year must receive prior approval from IDEM, OAQ.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the bun making oven and muffin griddle shall not exceed 10.1 pounds per hour and 5.73 pounds per hour when operating at a process weight rate of 3.85 tons per hour and 1.65 tons per hour, respectively.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for the bun oven facility.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the bun oven stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

Record Keeping and Reporting Requirement

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the bun oven stack exhaust once per shift.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.1.1, the Permittee shall maintain records of the emission factor (in pounds of VOC per ton of baked bread) calculated using the equation in AP-42, Chapter 9.9.6 -Bread Baking (February 1997).

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(c) Two (2) flour storage silos (identified as Unit C1 and C2), each with a maximum capacity of 60 tons and a maximum throughput rate of 6.25 tons of flour per hour, equipped with a pneumatic conveyance system, using fabric filters as control. These units were constructed in 1979.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the two (2) flour storage silos shall each not exceed 8.80 pounds per hour when operating at a process weight rate of 3.13 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Conditions D.2.1, the dry filters used for particulate control shall be in operation and control emissions from the two (2) flour storage silos at all times when the two (2) flour storage silos are in operation.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(d) One (1) natural gas fired Hurst boiler (identified as Unit D), with a maximum heat input capacity of 2.60 MMBtu per hour and exhausting at Stack D. This unit was constructed in 1979.

(e) One (1) natural gas fired Kewanee boiler (identified as Unit E), with a maximum heat input capacity of 1.80 MMBtu per hour and exhausting at Stack E. This unit was constructed in 1996.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.3.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (e) (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from all facilities used for indirect heating which were existing and in operation after June 8, 1972, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input. Therefore, the 2.605 MMBtu per hour Hurst boiler shall not exceed 0.6 pounds of particulate matter per MMBtu heat input.

D.3.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the 1.80 MMBtu per boiler, which was constructed after September 12, 1983, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(f) One (1) 5 KVA emergency generator (identified as Unit G), burning natural gas and exhausting at Stack G. This unit was constructed in 1983.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.4.1 Limitation on Operating Hours

Operation of one (1) 5 kV emergency generator shall in no case exceed 500 hours of operation per twelve (12) consecutive month period. Any changes to the source that would require operating either emergency generator for more than 500 hours per year must have prior approval from IDEM, OAQ.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.4.2 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records of the dates of operation and the number of hours of operation for the generator.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(g) Six (6) natural gas fired space heaters (identified as F1 through F6), each with a maximum heat input capacity of 0.10 MMBtu per hour. These units were installed in 1979.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

There are no specifically applicable requirements that apply to these emission units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**New Horizons Baking Company**
Address:	**5700 North West Street**
City:	**Fremont, Indiana 46737**
Phone #:	**(260) 495-7055**
MSOP #:	**151-17821-00060**

I hereby certify that New Horizons Baking Company is
- **9** still in operation.
- **9** no longer in operation.

I hereby certify that New Horizons Baking Company is
- **9** in compliance with the requirements of MSOP 151-17821-00060
- **9** not in compliance with the requirements of MSOP 151-17821-00060

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

October 16, 2003

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for a Minor Source Operating Permit (MSOP)

Source Name:	New Horizons Baking Company
Source Location:	5700 North West Street, Fremont, Indiana 46737
County:	Steuben
SIC Code:	2051
Operation Permit No.:	151-17821-00060
Permit Reviewer:	ERG/SD

On August 29, 2003, the Office of Air Quality (OAQ) had a notice published in the Herald Republican Newspaper, Angola, Indiana stating that New Horizons Baking Company had applied for a Minor Source Operating Permit (MSOP) relating to the operation of a bread baking company. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. Condition B.7(b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, B.7(c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit .

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) . .

(b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any**

limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

2. The notification requirement in C.10 has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. This provides OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

C.10 Compliance Response Plan - Preparation and Implementation

. . .

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan ; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify** the IDEM, OAQ ~~shall be promptly notified~~ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

October 16, 2003
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	New Horizons Baking Company
Source Location:	5700 North West Street, Fremont, Indiana 46737
County:	Steuben
SIC Code:	2051
Operation Permit No.:	151-17821-00060
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from New Horizons Baking Company relating to the operation of a bread baking company.

Unpermitted Emission Units and Pollution Control Equipment

(a) One (1) natural gas fired bun oven (identified as Unit A), with a maximum heat input capacity of 4.60 MMBtu per hour and a maximum baking rate of 7,700 pounds of bread per hour, and exhausting at Stack A. This unit was constructed in 1979.

(b) One (1) natural gas fired muffin griddle (identified as Unit B), with a maximum heat input capacity of 2.04 MMBtu per hour and a maximum baking rate of 3,300 pounds of bread per hour, and exhausting at Stack B. This unit was constructed in 1983.

(c) Two (2) flour storage silos (identified as Unit C1 and C2), each with a maximum capacity of 60 tons and a maximum throughput rate of 6.25 tons of flour per hour, equipped with a pneumatic conveyance system, using fabric filters as control. These units were constructed in 1979.

(d) One (1) natural gas fired Hurst boiler (identified as Unit D), with a maximum heat input capacity of 2.60 MMBtu per hour and exhausting at Stack D. This unit was constructed in 1979.

(e) One (1) natural gas fired Kewanee boiler (identified as Unit E), with a maximum heat input capacity of 1.80 MMBtu per hour and exhausting at Stack E. This unit was constructed in 1996.

(f) One (1) 5 KVA emergency generator (identified as Unit G), burning natural gas and exhausting at Stack G. This unit was constructed in 1983.

(g) Six (6) natural gas fired space heaters (identified as F1 through F6), each with a maximum heat input capacity of 0.10 MMBtu per hour. These units were installed in 1979.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new construction activities included in this permit.

Existing Approvals

No previous approvals have been issued to this source.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
A	Bun Oven	27	1.0	1555	400
B	Muffin Griddle	39	2.5	8,276	200
C1	Flour Silo 1	6	0.75	2,000	70
C2	Flour Silo 2	6	0.75	2,000	70
D	Hurst Boiler	17	1.0	951	400
E	Kewanee Boiler	17	1.0	766	400
F1 through 6	Space Heaters	20	0.25	<100	400
G	Emergency Generator	18	0.10	<100	700

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An complete application for the purposes of this review was received on June 20, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 11).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	1.35
PM10	1.35
SO_2	0.03
VOC	91.3
CO	4.29
NO_x	5.10

HAP's	Potential To Emit (tons/year)
Benzene	4.60E-05
Dichlorobenzene	2.63E-05
Formaldehyde	1.64E-03
Hexane	3.95E-02
Toluene	7.45E-05

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is greater than twenty-five (25) tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6-1. A MSOP will be issued.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

County Attainment Status

The source is located in Steuben County.

Pollutant	Status
PM10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Steuben County has been designated as attainment or unclassifiable for

ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Steuben County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/year)
PM	1.35
PM10	1.35
SO_2	0.03
VOC	91.3
CO	4.29
NO_x	5.10

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on potential to emit calculations (see Appendix A).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,

(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) The requirements of the New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60, Subpart Dc) are not applicable to two (2) natural gas fired boilers because:

(1) The 2.605 MMBtu per hour boiler was constructed before the applicability date of June 9, 1989 and has a maximum heat input capacity of less than 10 MMBtu per hour.

(2) The 1.80 MMBtu per hour boiler, though constructed after the applicability date of June 9, 1989, has a maximum heat input capacity of less than 10 MMBtu per hour.

There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source was constructed in 1979 and is not one (1) of twenty-eight (28) source categories as defined in 326 IAC 2-2-1(p)(1). At construction, the potential to emit of all criteria pollutants from the entire source were less than 250 tons per year. One (1) muffin griddle and an emergency generator were added in 1983; one (1) Kewanee boiler was added in 1996. After each of these modifications, the potential to emit of all criteria pollutants from the entire source remained less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Steuben County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of a bread baking plant will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Although constructed after October 7, 1974, this source is located in Steuben County and the potential emissions of VOC from the entire source are less than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are not applicable.

State Rule Applicability - Bun Oven, Muffin Griddle

326 IAC 8-1-6 (New Facilities ; General Reduction Requirements)

The potential emissions of VOC from the bun oven is greater than 25 tons per year. However, this oven was constructed before January 1, 1980 applicability date for this rule. Therefore, 326 IAC 8-1-

6 does not apply. Although constructed after January 1, 1980, the potential emissions of VOC from the muffin griddle are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations from Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the bun oven and muffin griddle shall not exceed 10.1 pounds per hour and 5.73 pounds per hour when operating at a process weight rate of 3.85 tons per hour and 1.65 tons per hour, respectively.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

According to the emission calculations (see Appendix A), the uncontrolled potential to emit of PM/PM10 from the bun making oven and muffin griddle are less than the limits above. Therefore, these emission units are in compliance with 326 IAC 6-3-2.

State Rule Applicability - Two (2) Storage Silos

326 IAC 6-3-2 (Particulate Emission Limitations from Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the two (2) flour storage silos shall each not exceed 8.80 pounds per hour when operating at a process weight rate of 3.13 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

According to the emission calculations (see Appendix A), the uncontrolled potential to emit of PM/PM10 from each silo are less than the limit above. Therefore, these storage silos are in compliance with 326 IAC 6-3-2.

State Rule Applicability - Two (2) Natural Gas Fired Boilers

326 IAC 6-2-3(a) (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-3, the particulate emissions from the 2.605 MMBtu per hour Hurst boiler, which was existing and in operation before September 21, 1983 shall not exceed the particulate emission rate calculated using the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where

C = max ground level concentration (= 50 Fm/m^3)
Pt = emission rate limit (lbs per MMBtu)

Q = total source heat input capacity (MMBtu per hour)
N = number of stacks = 1
a = plume rise factor = 0.67
h = stack height (ft) = 17 ft

The emission rate limit calculated using the equation above is:

$$Pt = \frac{50 \times 0.67 \times 17}{76.5 \times 2.605^{0.75} \times 1^{0.25}} = 3.63 \text{ lbs per MMBtu}$$

However, 326 IAC 6-2-3(e) states that boilers constructed after June 8, 1972 shall in no case exceed 0.6 pounds of particulate matter per MMBtu heat input. Since the 0.6 pounds particulate matter per MMBtu emission limit is less than the limit calculated using the equation, the 2.605 MMBtu per hour Hurst boiler shall be limited to 0.6 pounds of particulate matter per MMBtu heat input.

326 IAC 6-2-4 (a) (Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the 1.80 MMBtu per hour Kewanee boiler which was existing and in operation after September 21, 1983 shall be limited to the emission rate limit calculated using the equation below:

$$Pt = \frac{1.09}{Q^{0.26}}$$

The emission rate limit calculated using the equation above is:

$$Pt = \frac{1.09}{(2.605 + 1.80)^{0.26}} = 0.75 \text{ lbs per MMBtu}$$

However, 326 IAC 6-2-4(a) also states that for Q less than 10 MMBtu per hour. The particulate emissions shall not exceed 0.6 pounds per MMBtu. For this source, Q is equal to 4.41 MMBtu per hour (i.e., the summation of 2.605 MMBtu per hour and 1.80 MMBtu per hour). Therefore, the particulate emissions from this 4.41 MMBtu per hour boiler shall not exceed 0.6 pounds per MMBtu.

State Rule Applicability - One (1) Emergency Generator

As per the EPA guidance dated September 6, 1995, an emergency generator means a generator which has the sole function of providing backup power when electric power from the local utility is interrupted, and which in no case shall exceed 500 hours of operation per year. Therefore, the one (1) 5KV emergency generator is limited to 500 hours of operation per year.

State Rule Applicability - Six (6) Space Heaters

There are no specifically applicable regulations that apply to these emission units.

Conclusion

The operation of this bread making plant shall be subject to the conditions of the attached Minor Source Operating Permit 151-17821-00060.

Appendix A: Emission Calculations
Six (6) Space Heaters

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

Heat Input Capacity MMBtu/hour		Potential Throughput MMCF/year
0.60	(6 Units Total)	5.26

Pollutant

	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential To Emit (tons/year)	0.02	0.02	0.002	0.26	0.01	0.22

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton//2000 lbs

See page 2 for HAPs emissions calculations.

Appendix A: Emission Calculations
Six (6) Space Heaters

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	5.52E-06	3.15E-06	1.97E-04	4.73E-03	8.94E-06

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	1.31E-06	2.89E-06	3.68E-06	9.99E-07	5.52E-06

Methodology is the same as previous page.
The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Two (2) Natural Gas Fired Boilers (identified as D and E)

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

Heat Input Capacity MMBtu/hour		Potential Throughput MMCF/year
4.41	(2 Units Total)	38.6

Pollutant

	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential To Emit (tons/year)	0.15	0.15	0.01	1.93	0.11	1.62

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32
Emission factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton//2000 lbs

See page 4 for HAPs emissions calculations.

Appendix A: Emission Calculations
Two (2) Natural Gas Fired Boilers (identified as D and E)

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	4.05E-05	2.32E-05	1.45E-03	3.47E-02	6.56E-05

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	9.65E-06	2.12E-05	2.70E-05	7.33E-06	4.05E-05

Methodology is the same as previous page.
The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
One (1) Bun Oven, And One (1) Muffin Griddle

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

Heat Input Capacity MMBtu/hour		Potential Throughput MMCF/year
6.64	(2 Units Total)	58.2

Pollutant

	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential To Emit (tons/year)	0.22	0.22	0.02	2.91	0.16	2.44

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton//2000 lbs

See page 6 for HAPs emissions calculations.

Appendix A: Emission Calculations
One (1) Bun Oven, And One (1) Muffin Griddle

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	6.11E-05	3.49E-05	2.18E-03	5.23E-02	9.89E-05

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	1.45E-05	3.20E-05	4.07E-05	1.11E-05	6.11E-05

Methodology is the same as previous page.
The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
VOC Emissions From One (1) Bun Baking Oven

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

1. VOC Emissions from Bread Baking:

Maximum Baking Rate = 7700 pounds bread per hour

According to AP-42, Chapter 9.9.6 - Bread Baking (02/97), the VOC emission factor from the bread baking process can be estimated with the following equation:

E.F. (lb VOC/ton of baked bread) = 0.95 Yi + 0.195 ti - 0.51S - 0.86ts + 1.90

where

Initial baker's percent of yeast (Yi) =	2.81
Total yeast action time in hours (ti) =	2.75
Final (spike) baker's percent of yeast (S) =	1.25
Spiking time in hours (ts) =	0.91
E.F. (lb/ton) =	**3.69**

The Potential To Emit of VOC Uncontrolled From Bread Baking =

7700 lbs/hour * 1 ton/2000 lbs * 3.69 lbs/ton * 8760 hours/year * 1 tons/2000 lbs = **62.2 ton/year**

Appendix A: Emission Calculations
VOC Emissions From One (1) Muffin Griddle

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

1. VOC Emissions from Bread Baking:

Maximum Baking Rate = 3300 pounds bread per hour

According to AP-42, Chapter 9.9.6 - Bread Baking (02/97), the VOC emission factor from the bread baking process can be estimated with the following equation:

E.F. (lb VOC/ton of baked bread) = 0.95 Yi + 0.195 ti - 0.51S - 0.86ts + 1.90

where
Initial baker's percent of yeast (Yi)
Total yeast action time in hours (ti)
Final (spike) baker's percent of yeast (S)
Spiking time in hours (ts)

The emission factor for muffin griddle based on American Institue of Bakers - Bakery Oven Ethanol Emissions, Vol IX, Issue 12 (12/87).

The Potential To Emit of VOC Uncontrolled From Bread Baking =
3300 lbs/hour * 1 ton/2000 lbs * 4.0 lbs/ton * 8760 hours/year * 1 tons/2000 lbs = **28.9 ton/year**

The Emission Factor came from American Institute of Bakers

Appendix A: Emission Calculations
One (1) 5 KVA Emergency Generator Using Natural Gas

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

Heat Input Capacity MMBtu/hour	Potential Throughput MMBtu/year
0.014	6.83

Pollutant

	PM*	PM10*	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMBtu)	9.91E-03	9.91E-03	5.88E-04	0.847	0.118	0.557
** Potential To Emit (tons/year)	3.38E-05	3.38E-05	2.01E-06	2.89E-03	4.03E-04	1.90E-03

*PM and PM10 emission factors are condensible PM and PM10 only.
Emission factors are from AP-42, Chapter 3.2, Tables 3.2-1, SCC 2-02-002-54 (July, 2000).
** According to EPA's guidance, an emergency generator is a unit operating less than 500 hours per year.

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu

METHODOLOGY
Potential Throughput (MMBtu/year) = Heat Input Capacity (MMBtu/hour) * 500 hours/year
Potential To Emit (tons/year) = Potential Throughput (MMBtu/year) * Emission Factor (lb/MMBtu) * 1 ton//2000 lbs

Appendix A: Emission Calculations
PM/PM10 Emissions
From Two (2) Storage Silos

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

1. Process Descriptions:

Combined Silo Capacity =	120	ton
Max Throughput Rate for Two (2) Silos =	6.25	tons/hour
Control Device =	fabric filters	
*** PM/PM10 Emission Factor =**	0.035	lbs/ton

The flour is delivered via tank trucks and the silos are filled pneumatically. Two fabric filters are installed at the top of each silo to equalize the pressure and to prevent the flour from emitting to the atmosphere.

* Emission factors for PM/PM10 is from AP-42, Tables 9.9.1-1, SCC 3-02-005-52 - Grain receiving by hopper truck (05/98)
This emission factor is for wheat loading. There is no emission factor available for flour loading in AP-42.

2. Potential To Emit of PM/PM10 Uncontrolled From Two Silos:

Hourly Potential To Emit of PM/PM10 =	6.25 tons/hour * 0.035 lbs/ton =	**0.22 lb/hour**
Annual Potential To Emit of PM/PM10 =	0.22 tons/year * 8760 hours/year * 1 ton/2000 lbs =	**0.96 tons/year**

Appendix A: Emission Calculations
Summary

Company Name: New Horizons Baking Company
Address: 5700 North West Street, Fremont, Indiana 46737
MSOP: 151-17821
Plt ID: 151-00060
Reviewer: ERG/SD
Date: July 23, 2003

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	HAPs
Space Heaters	0.02	0.02	0.002	0.26	0.01	0.22	Negligible
Boilers	0.15	0.15	0.01	1.93	0.11	1.62	Negligible
Bun and Muffin Ovens (Combustion)	0.22	0.22	0.02	2.91	0.16	2.44	Negligible
Bun Making Ovens (Fermentation)					62.2		
Muffin Griddle (Fermentation)					28.9		
Emergency Generator	3.4E-05	3.4E-05	2.0E-06	2.9E-03	4.0E-04	1.9E-03	
Silos	0.96	0.96					
TOTAL SUM	1.35	1.35	0.03	5.10	91.3	4.29	